

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**TWENTY SIXTH MONTHLY FEE STATEMENT OF FTI CONSULTING, INC. FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM  
MARCH 1, 2021 THROUGH MAY 31, 2021**

Name of Applicant:

FTI Consulting, Inc.

Authorized to provide Professional Services  
to:

Official Committee of Unsecured Creditors

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Date of Retention: December 19, 2018, *nunc pro tunc* to  
October 25, 2018

Period for which compensation and  
reimbursement is sought: March 1, 2021 through May 31,  
2021

Monthly Fees Incurred: \$102,095.00

Monthly Expenses Incurred: \$0.00

Total Fees and Expenses: \$102,095.00

This is a: X monthly \_\_\_\_\_ interim \_\_\_\_\_ final application

This statement (the “**Fee Statement**”) of FTI Consulting, Inc. (together with its wholly owned subsidiaries and independent contractors, “**FTI**”) as financial advisor to the Official Committee of Unsecured Creditors of Sears Holdings Corporation, *et al.* (the “**Committee**”) is submitted in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No.796] entered on November 16, 2018, (the “**Order**”). In support of this Fee Statement, FTI respectfully states as follows.

1. The fees and expenses for the period from March 1, 2021 through and including May 31, 2021 (the “**Twenty Sixth Fee Period**”) amount to:

Professional Fees	\$102,095.00
Expenses	<u>0.00</u>
<b>TOTAL</b>	<b><u>\$102,095.00</u></b>

2. In accordance with the Order, if no timely and proper objection is made by a party-in-interest within fifteen (15) days after service of this Fee Statement, the Debtors are authorized to pay 80% of professional fees and 100% of out-of-pocket expenses. These amounts are presented below.

Professional Fees at 80%	\$81,676.00
Expenses at 100%	<u>0.00</u>
<b>TOTAL</b>	<b><u>\$81,676.00</u></b>

3. The professionals providing services, hourly billing rates, the aggregate hours worked by each professional, and the aggregate hourly fees for each professional during the Twenty Sixth Fee Period are set forth on the schedule annexed hereto as **Exhibit “A.”**

4. A summary of aggregate hours worked and aggregate hourly fees for each task code during the Twenty Sixth Fee Period is set forth on the schedule annexed hereto as **Exhibit “B.”**

5. Detailed time entry by task code during the Twenty Sixth Fee Period is set forth on the schedule annexed hereto as **Exhibit “C.”**

6. A summary of expenses incurred during the Twenty Sixth Fee Period is set forth on the schedule annexed hereto as **Exhibit “D.”**

7. Detailed breakdown of the expenses incurred during the Twenty Sixth Fee Period is set forth on the schedule annexed hereto as **Exhibit “E.”**

8. FTI reserves the right to request, in subsequent fee statements and applications, any fees and reimbursement of any additional expenses incurred during the Twenty Sixth Fee Period, as such fees and expenses may not have been captured to date in FTI’s billing system.

### **NOTICE AND OBJECTION PROCEDURES**

9. Notice of this Fee Statement shall be given by hand or overnight delivery or email where available upon (i) Sears Holdings Corporation, 3333 Beverly Road, Hoffman Estates, Illinois 60179, Attention: Mohsin Y. Meghji (email: mmeghji@miiipartners.com); (ii) counsel to the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153, Attention: Ray C. Schrock (email: ray.schrock@weil.com), Jacqueline Marcus (email: jacqueline.marcus@weil.com), Garrett A. Fail (email: garrett.fail@weil.com), and Sunny Singh (email: sunny.singh@weil.com); (iii) William K. Harrington, the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014, Attention: Paul Schwartzberg (e-mail: paul.schwartzberg@usdoj.gov) and Richard Morrissey (e-mail: richard.morrissey@usdoj.gov); and (iv) counsel to Bank of America, N.A., Skadden, Arps, Slate, Meagher & Flom LLP, 4 Times Square, New York, NY 10036, Attention: Paul D. Leake (email: paul.leake@skadden.com), Shana A. Elberg (email: shana.elberg@skadden.com) and George R. Howard (email: george.howard@skadden.com); (v) Paul E. Harner, fee examiner, 1675 Broadway, New York, NY 10019 (email: harnerp@ballardspahr.com); and (vi) counsel to the fee examiner, Ballard Spahr LLP, 1675 Broadway, New York, NY 10019, Attention: Vincent J. Marriott (email: marriott@ballardspahr.com) and Tobey M. Daluz (email: daluzt@ballardspahr.com) (collectively, the “Notice Parties”).

10. Objections to this Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than June 28, 2021 (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

11. If no objections to this Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

12. If an objection to this Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: New York, New York  
June 11, 2021

FTI CONSULTING, INC.  
Financial Advisors to the Official Committee of  
Unsecured Creditors of Sears Holdings Corporation

By: /s/ Matthew Diaz  
Matthew Diaz, Senior Managing Director  
Three Times Square, 10<sup>th</sup> Floor  
New York, New York 10036  
Telephone: (212) 499-3611  
Email: matt.diaz@fticonsulting.com

**EXHIBIT A****SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538****SUMMARY OF HOURS BY PROFESSIONAL****FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Professional</b>	<b>Position</b>	<b>Specialty</b>	<b>Billing Rate<sup>1</sup></b>	<b>Total Hours</b>	<b>Total Fees</b>
Nelson, Cynthia A	Sr Managing Dir	Retail	\$ 1,120	0.9	\$ 1,008.00
Star, Samuel	Sr Managing Dir	Restructuring	1,165	2.2	2,563.00
Diaz, Matthew	Sr Managing Dir	Restructuring	1,120	21.9	24,528.00
Eisler, Marshall	Managing Director	Restructuring	881	20.3	17,889.50
Kim, Ye Darm	Sr Consultant	Restructuring	635	84.3	53,530.50
Shapiro, Jill	Sr Consultant	Restructuring	553	4.4	2,431.00
Hellmund-Mora, Marili	Project Asst	Restructuring	290	0.5	145.00
<b>TOTAL</b>				<b>134.5</b>	<b>\$ 102,095.00</b>

<sup>1</sup>Promotions were effective April 1, 2021. The rate reflected herein represents the blended rate based on time incurred during the Application Period. The positions reflect current positions following promotions.

**EXHIBIT B****SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538****SUMMARY OF HOURS BY TASK****FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Task Code</b>	<b>Task Description</b>	<b>Total Hours</b>	<b>Total Fees</b>
1	Current Operating Results & Events	2.8	\$ 2,117.50
3	Financing Matters (DIP, Exit, Other)	103.5	77,801.00
5	Real Estate Issues	0.9	1,008.00
11	Prepare for and Attend Court Hearings	0.9	1,012.50
14	Analysis of Claims and Liabilities Subject to Compromise	0.6	381.00
17	Wind Down Monitoring	3.2	1,966.00
18	Potential Avoidance Actions & Litigation	10.4	8,864.50
20	General Meetings with Debtor & Debtors' Professionals	2.3	2,091.00
23	Firm Retention	3.6	2,789.00
24	Preparation of Fee Application	6.3	4,064.50
<b>TOTAL</b>		<b>134.5</b>	<b>\$102,095.00</b>

**EXHIBIT C**  
**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538**  
**DETAIL OF TIME ENTRIES**  
**FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Task Category</b>	<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Activity</b>
1	4/6/2021	Kim, Ye Darm	0.4	Review APA motion and summary from counsel.
1	4/12/2021	Kim, Ye Darm	0.4	Analyze status report for administrative claim assumptions.
1	4/27/2021	Diaz, Matthew	0.7	Review the status report.
1	4/27/2021	Kim, Ye Darm	0.7	Review latest status report.
1	4/30/2021	Kim, Ye Darm	0.6	Draft summary of call with M-III re: latest status report.
<b>1 Total</b>			<b>2.8</b>	
3	3/1/2021	Kim, Ye Darm	0.8	Prepare litigation funding materials.
3	3/8/2021	Kim, Ye Darm	0.3	Review latest analysis re: litigation funding.
3	3/24/2021	Kim, Ye Darm	0.9	Review the litigation funding analysis.
3	3/25/2021	Kim, Ye Darm	3.8	Prepare analysis re: litigation funding.
3	3/26/2021	Kim, Ye Darm	0.5	Participate in call re: litigation funding issues.
3	3/26/2021	Kim, Ye Darm	0.4	Review litigation funding materials.
3	3/26/2021	Kim, Ye Darm	2.1	Prepare updated analysis re: litigation funding.
3	3/26/2021	Kim, Ye Darm	1.1	Process revisions to litigation funding analysis.
3	3/29/2021	Kim, Ye Darm	1.2	Prepare updated materials re: litigation funding.
3	3/30/2021	Kim, Ye Darm	0.5	Participate in call re: funding analysis.
3	3/30/2021	Kim, Ye Darm	0.6	Participate in call re: updates to funding analysis.
3	3/30/2021	Kim, Ye Darm	0.8	Process revisions to funding analysis.
3	3/30/2021	Kim, Ye Darm	1.1	Process updates to analysis re: litigation funding.
3	3/31/2021	Kim, Ye Darm	0.5	Participate in call re: litigation funding.
3	3/31/2021	Kim, Ye Darm	0.3	Update litigation funding materials.
3	3/31/2021	Kim, Ye Darm	2.7	Prepare draft materials re: funding analysis.
3	3/31/2021	Kim, Ye Darm	1.8	Process updates to litigation funding materials.
3	4/1/2021	Diaz, Matthew	1.1	Review materials re: litigation funding.
3	4/1/2021	Kim, Ye Darm	0.6	Draft responses to open questions re: litigation funding analysis.
3	4/1/2021	Kim, Ye Darm	2.7	Process revisions to the litigation funding materials.
3	4/2/2021	Kim, Ye Darm	1.5	Revise the litigation funding materials.
3	4/2/2021	Kim, Ye Darm	1.7	Update litigation funding materials.
3	4/5/2021	Diaz, Matthew	0.6	Review updated materials re: litigation funding.
3	4/5/2021	Kim, Ye Darm	1.7	Prepare updated litigation funding analysis.
3	4/6/2021	Diaz, Matthew	1.6	Review the Sears litigation funding issues.
3	4/6/2021	Kim, Ye Darm	0.6	Participate in call re: litigation funding issues.
3	4/6/2021	Kim, Ye Darm	0.9	Participate in call re: litigation funding analysis.
3	4/6/2021	Kim, Ye Darm	2.1	Process revisions to litigation funding analysis.
3	4/6/2021	Kim, Ye Darm	1.2	Perform detailed QC of litigation funding materials.
3	4/6/2021	Kim, Ye Darm	1.1	Process revisions to litigation funding materials.
3	4/6/2021	Kim, Ye Darm	0.7	Finalize revisions to funding materials.
3	4/12/2021	Diaz, Matthew	0.5	Participate in a call with Counsel to discuss litigation funding materials.
3	4/12/2021	Diaz, Matthew	0.9	Review the updated litigation funding materials.
3	4/12/2021	Kim, Ye Darm	0.3	Participate in pre-call re: litigation funding analysis.
3	4/12/2021	Kim, Ye Darm	0.3	Participate on call with Counsel re: litigation funding.
3	4/12/2021	Kim, Ye Darm	0.5	Participate in a call with Counsel re: litigation funding materials.
3	4/12/2021	Kim, Ye Darm	1.7	Examine issues re: litigation funding.
3	4/12/2021	Kim, Ye Darm	0.6	Review Counsel proposed updates to funding analysis.
3	4/12/2021	Eisler, Marshall	2.1	Incorporate comments into litigation funding analysis.
3	4/13/2021	Diaz, Matthew	1.6	Review the updated funding analysis.
3	4/13/2021	Kim, Ye Darm	0.8	Participate in call re: litigation funding issues.
3	4/13/2021	Kim, Ye Darm	2.9	Prepare analysis re: litigation funding.
3	4/13/2021	Kim, Ye Darm	1.6	Prepare updated materials re: litigation funding analysis.
3	4/13/2021	Kim, Ye Darm	1.9	Process updates to litigation funding materials.
3	4/13/2021	Eisler, Marshall	2.2	Provide additional comments to litigation funding materials.
3	4/14/2021	Star, Samuel	0.5	Review litigation funding analysis.



**EXHIBIT C**  
**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538**  
**DETAIL OF TIME ENTRIES**  
**FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Task Category</b>	<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Activity</b>
3	4/14/2021	Eisler, Marshall	1.3	Prepare for and participate in call to discuss litigation funding analysis.
3	4/14/2021	Eisler, Marshall	1.1	Provide additional comments to litigation funding analysis.
3	4/15/2021	Diaz, Matthew	1.9	Review the Sears litigation funding analysis.
3	4/15/2021	Diaz, Matthew	0.4	[Partial] Participate in a call with Counsel to discuss the funding analysis.
3	4/15/2021	Diaz, Matthew	1.1	Review the updated funding analysis.
3	4/15/2021	Kim, Ye Darm	0.5	Participate in call re: updated litigation funding analysis.
3	4/15/2021	Kim, Ye Darm	1.0	Participate in a call with Counsel to discuss the funding analysis.
3	4/15/2021	Kim, Ye Darm	1.8	Prepare updated materials re: litigation funding.
3	4/15/2021	Kim, Ye Darm	1.4	Continue to prepare materials re: litigation funding.
3	4/15/2021	Kim, Ye Darm	0.8	Process updates to litigation funding materials.
3	4/15/2021	Star, Samuel	0.5	Review and comment on litigation funding analysis.
3	4/15/2021	Star, Samuel	0.5	Participate in call re: updated litigation funding analysis.
3	4/15/2021	Eisler, Marshall	0.5	Participate in call re: updated litigation funding analysis.
3	4/15/2021	Eisler, Marshall	1.6	Examine key issues re: litigation funding.
3	4/16/2021	Diaz, Matthew	0.8	Review the updated litigation funding materials.
3	4/16/2021	Diaz, Matthew	0.7	Provide comments re: litigation funding materials.
3	4/16/2021	Kim, Ye Darm	0.6	Draft response to Counsel re: updated litigation funding analysis.
3	4/16/2021	Kim, Ye Darm	0.5	Draft additional responses to Counsel re: updated litigation funding analysis.
3	4/16/2021	Kim, Ye Darm	2.5	Process revisions to the litigation funding materials per Counsel's comments.
3	4/16/2021	Star, Samuel	0.2	Review Counsel's comments to litigation funding analysis.
3	4/16/2021	Eisler, Marshall	1.9	Correspond with Akin re: litigation funding analysis.
3	4/16/2021	Eisler, Marshall	0.9	Provide comments to latest litigation funding analysis.
3	4/17/2021	Kim, Ye Darm	0.4	Update litigation funding materials.
3	4/17/2021	Eisler, Marshall	1.1	Provide comments to latest draft of litigation funding analysis.
3	4/18/2021	Kim, Ye Darm	0.5	Prepare responses to Counsel re: litigation funding.
3	4/19/2021	Diaz, Matthew	1.5	Review the funding analysis.
3	4/19/2021	Diaz, Matthew	0.7	Review the updated litigation funding materials.
3	4/19/2021	Kim, Ye Darm	0.6	Participate in call re: litigation funding materials.
3	4/19/2021	Kim, Ye Darm	2.7	Evaluate key issues re: litigation funding.
3	4/19/2021	Kim, Ye Darm	0.6	Process revisions to the funding materials.
3	4/19/2021	Kim, Ye Darm	2.1	Update litigation funding materials.
3	4/19/2021	Kim, Ye Darm	1.7	Review litigation funding materials.
3	4/19/2021	Kim, Ye Darm	0.5	Prepare additional updates to litigation funding materials.
3	4/19/2021	Kim, Ye Darm	1.9	Develop analysis re: litigation funding.
3	4/19/2021	Kim, Ye Darm	0.6	Finalize litigation funding analysis.
3	4/20/2021	Diaz, Matthew	0.6	Review the updated litigation funding materials.
3	4/22/2021	Diaz, Matthew	0.8	Review key issues re: litigation funding.
3	4/22/2021	Kim, Ye Darm	0.7	Participate in call re: litigation funding.
3	4/22/2021	Kim, Ye Darm	1.2	Process revisions to funding analysis.
3	4/22/2021	Kim, Ye Darm	1.4	Prepare updated materials re: funding analysis.
3	4/22/2021	Kim, Ye Darm	1.3	Produce updated summary re: litigation funding issues.
3	4/23/2021	Diaz, Matthew	0.6	Review the updated funding analysis.
3	4/25/2021	Kim, Ye Darm	0.3	Prepare additional materials re: litigation funding.
3	4/26/2021	Diaz, Matthew	0.5	Review the updated funding analysis.
3	4/26/2021	Kim, Ye Darm	0.3	Update materials re: litigation funding.
3	5/18/2021	Diaz, Matthew	0.3	Review the litigation funding materials.
3	5/18/2021	Kim, Ye Darm	0.6	Prepare summary re: litigation funding key issues.
3	5/19/2021	Kim, Ye Darm	0.4	Revise draft summary re: litigation funding issues.
3	5/20/2021	Kim, Ye Darm	0.5	Process revisions to summary re: litigation funding key issues.
3	5/21/2021	Kim, Ye Darm	0.4	Update litigation funding summary.
3	5/24/2021	Diaz, Matthew	0.3	Review key issues re: litigation funding.
<b>3 Total</b>			<b>103.5</b>	

**EXHIBIT C**  
**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538**  
**DETAIL OF TIME ENTRIES**  
**FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Task Category</b>	<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Activity</b>
5	3/30/2021	Nelson, Cynthia A	0.4	Review Debtors' requests re: proposed sales of various real estate parcels.
5	4/9/2021	Nelson, Cynthia A	0.3	Review Debtors' proposed sale of property.
5	4/20/2021	Nelson, Cynthia A	0.2	Respond to Debtors regarding proposed sale of excess land parcel.
<b>5 Total</b>			<b>0.9</b>	
11	4/27/2021	Diaz, Matthew	0.3	Review the hearing summary from Counsel.
11	5/25/2021	Star, Samuel	0.1	Review memo from Counsel re: court hearing.
11	5/25/2021	Diaz, Matthew	0.3	Review summaries from Counsel re: court hearing.
11	5/25/2021	Diaz, Matthew	0.2	Review materials in preparation for hearing.
<b>11 Total</b>			<b>0.9</b>	
14	3/22/2021	Kim, Ye Darm	0.3	Review revised settlement proposal re: preferences.
14	3/23/2021	Kim, Ye Darm	0.3	Correspond with Counsel re: preference settlement.
<b>14 Total</b>			<b>0.6</b>	
17	3/16/2021	Kim, Ye Darm	0.4	Participate in call with M-III re: proposed preference settlement.
17	3/16/2021	Kim, Ye Darm	0.4	Review terms of settlement re: preferences.
17	3/16/2021	Kim, Ye Darm	0.3	Draft summary of preference settlement issues.
17	3/16/2021	Shapiro, Jill	0.4	Participate in call with M-III re: proposed preference settlement.
17	3/17/2021	Kim, Ye Darm	0.6	Participate in call with M-III and ASK re: preference settlement.
17	3/17/2021	Kim, Ye Darm	0.3	Prepare response for Counsel re: preference settlement issues.
17	3/17/2021	Kim, Ye Darm	0.3	Participate in internal correspondence re: preference settlement.
17	3/17/2021	Kim, Ye Darm	0.3	Participate in internal correspondence re: preference settlement issues.
17	3/24/2021	Kim, Ye Darm	0.2	Correspond with M-III re: preference settlement.
<b>17 Total</b>			<b>3.2</b>	
18	3/5/2021	Eisler, Marshall	3.2	Prepare Potential Financier waterfall exhibit for litigation trustees.
18	3/8/2021	Eisler, Marshall	2.3	Respond to diligence request from Counsel.
18	3/16/2021	Diaz, Matthew	0.6	Review the proposed Sears preference settlement.
18	3/17/2021	Eisler, Marshall	2.1	Diligence proposed preference settlement as detailed by M-III.
18	3/22/2021	Diaz, Matthew	0.3	Review the proposed preference settlement.
18	4/15/2021	Kim, Ye Darm	0.7	Review analyst reports.
18	4/23/2021	Kim, Ye Darm	0.7	Calculate break-even points re: recoveries.
18	4/28/2021	Kim, Ye Darm	0.5	Review updated forecast re: funding requirements.
<b>18 Total</b>			<b>10.4</b>	
20	3/5/2021	Diaz, Matthew	0.3	Prepare for call re: funding analysis.
20	3/5/2021	Diaz, Matthew	0.5	Participate on call to discuss materials re: litigation funding.
20	4/12/2021	Diaz, Matthew	0.5	Participate on call re: litigation funding materials.
20	4/12/2021	Kim, Ye Darm	0.5	Participate on call re: litigation funding materials.
20	4/30/2021	Kim, Ye Darm	0.5	Participate in call w M-III re: latest status report.
<b>20 Total</b>			<b>2.3</b>	
23	4/27/2021	Star, Samuel	0.1	Develop disclosure for new connection with party in interest.
23	4/28/2021	Star, Samuel	0.3	Review draft disclosure for new connection with interested party.
23	4/29/2021	Kim, Ye Darm	1.2	Review prior declarations to prepare draft declaration and related disclosure.
23	4/29/2021	Kim, Ye Darm	0.8	Prepare draft of FTI disclosure statement.
23	4/30/2021	Diaz, Matthew	0.6	Review the Sears declaration.
23	4/30/2021	Kim, Ye Darm	0.6	Prepare redlines of draft FTI declaration.
<b>23 Total</b>			<b>3.6</b>	
24	3/29/2021	Shapiro, Jill	0.7	Prepare the twenty fifth combined monthly fee statement.
24	4/7/2021	Diaz, Matthew	0.4	Review the twenty fifth combined monthly fee statement.
24	4/7/2021	Shapiro, Jill	0.7	Prepare updates to the combined twenty fifth monthly fee statement.
24	4/9/2021	Shapiro, Jill	0.4	Prepare the interim fee application.
24	4/10/2021	Shapiro, Jill	0.3	Prepare update to the interim fee application.
24	4/12/2021	Kim, Ye Darm	0.7	Review interim bill and update task code descriptions.
24	4/12/2021	Shapiro, Jill	0.2	Update combined monthly fee statement.
24	4/12/2021	Shapiro, Jill	0.5	Update interim fee application.

**EXHIBIT C**  
**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538**  
**DETAIL OF TIME ENTRIES**  
**FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Task Category</b>	<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Activity</b>
24	4/13/2021	Shapiro, Jill	0.4	Prepare updates to the interim fee application.
24	4/13/2021	Shapiro, Jill	0.1	Process revisions to the combined monthly fee statement.
24	4/14/2021	Shapiro, Jill	0.4	Update combined monthly fee statement and interim fee statement.
24	4/15/2021	Diaz, Matthew	0.7	Review the Sears fee applications.
24	4/19/2021	Hellmund-Mora, Marili	0.5	Update and finalize the fee application.
24	5/5/2021	Shapiro, Jill	0.3	Review proposed seventh interim order.
<b>24 Total</b>			<b>6.3</b>	
<b>Grand Total</b>			<b>134.5</b>	

**EXHIBIT D**

**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538**

**SUMMARY OF EXPENSES**

**FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Expense Type</b>	<b>Amount</b>
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**Not Applicable in this month.**

**EXHIBIT E**

**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538**

**EXPENSE DETAIL**

**FOR THE PERIOD MARCH 1, 2021 TO MAY 31, 2021**

<b>Date</b>	<b>Professional</b>	<b>Expense Type</b>	<b>Expense Detail</b>	<b>Amount</b>
<b>Not Applicable in this month.</b>				